VOC emissions after control all the emission units associated with the SDS II shall be less than 95.6 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, along with emissions from the pot still and emergency generator, shall limit the potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-3 (Emission Offset) not applicable for this 2015 modification.

D.1.2 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following conditions shall apply:

- (a) PM emissions after control from the SHS shall not exceed 18.9 pounds per hour.
- (b) PM₁₀ emissions after control from the SHS shall not exceed 18.9 pounds per hour.
- (c) PM_{2.5} emissions after control from the SHS shall not exceed 18.9 pounds per hour.
- (d) CO emissions (after control) from the SDS VRU shall not exceed 7.4 pounds per hour of SDS vapor product processed.
- (e) CO emissions (after control) from the SDS II VRU II shall not exceed 7.4 pounds per hour of SDS II vapor product processed.

Compliance with this limit, combined with the potential to emit CO, PM, PM_{10} , and $PM_{2.5}$ from other emission units at the source, shall limit the CO, PM, PM_{10} , and $PM_{2.5}$ emissions from the entire source to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

D.1.3 Best Available Control Technology (BACT) - VOC [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (BACT) and SSM 089-34432-00345, the Permittee shall comply with the following Best Available Control Technology (BACT) requirements:

- (a) The vapor recovery units, SDS VRU and SDS II VRU II, shall be controlled by open flare FL1 with an overall VOC control efficiency (including the capture efficiency and destruction efficiency) of equal to or greater than 98%, at all times that SDS VRU and/or SDS II VRU II are in operation, except during maintenance or malfunction of the flare FL1. During maintenance or malfunction of the flare FL1, the SDS VRU shall be controlled by the carbon adsorption system (C18) with an overall VOC control efficiency (including the capture efficiency and destruction efficiency) of equal to or greater than 98%, at all times that the SDS VRU is in operation and the SDS II VRU II shall be controlled by the carbon adsorption system (C38) with an overall VOC control efficiency (including the capture efficiency and destruction efficiency) of equal to or greater than 98%, at all times that the SDS II VRU II is in operation.
- (b) VOC emissions after control from the SDS VRU shall be less than 23.4 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) VOC emissions after control from all the emission units associated with the SDS II shall be less than 95.6 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.
- Each of the emission units listed in the table below shall be controlled by the associated carbon adsorption system with an overall VOC control efficiency (including the capture efficiency and destruction efficiency) of equal to or greater than 98%, at all times that each of these emission units are in operation.

Deliberative Process - Ex

317-232-8217

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Tradebe Treatment and Recycling LLC East Chicago, Indiana Permit Reviewer: Heath Hartley

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SDS II 03.

- Four (4) tanks, identified as Tank 81 through 84, each with a maximum of 12,000 gal, (6)used to store liquid products venting to a common carbon adsorption system for VOC control (C40), exhausting to stack SDS II 08.
- One (1) tank, identified as Tank 85 used to store process water, with a maximum of (7)22,000 gal, venting to a carbon adsorption system for VOC control (C41), exhausting to stack SDS II 07.
- One (1) tank, identified as Tank 86 used to store process water/light sludge water, with a (8)maximum of 22,000 gal, venting to a carbon adsorption system for VOC control (C42), exhausting to stack SDS II 06.
- (9)One (1) tank, identified as Tank 87 used to store oil/solvent, with a maximum of 22,000 gal, venting to a carbon adsorption system for VOC control (C43), exhausting to stack SDS II 06.
- (10)One (1) insignificant cooling tower, identified as SDS II 13.

Under 40 CFR 61, Subpart V and 40 CFR 61, Subpart FF, this unit is considered an affected facility.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

Emission Offset [326 IAC 2-3]

Pursuant to MSM 089-15970-00345, issued December 2, 2003, and MPM 089-18513-(a) 00345, issued February 4, 2004, and as revised by this Part 70 permit, the VOC emissions from the SDS shredder, Solids Distillation System and Distillation Unit shall not exceed the emission limits listed in the table below:

Unit ID	Stack(s) ID	VOC Emission Limit (lb/hr)
SDS Shredder	SDS 01(a) and (b).	0.028, total
Solids Distillation System*	SDS 02, SDS 03, SDS 04, SDS 08, and SDS 09	0.169, total
Distillation Unit	SDS 05	0.014

^{*} Not including the SDS Shredder

(b) In order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable for the 2003 modification, the Permittee shall comply with the following:

VOC emissions after control from the SDS VRU shall be less than 23.4 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall limit VOC emissions to less than 25 tons per twelve (12) consecutive month period from the emission units added in as part of MSM 089-15970-00345, issued December 2, 2003. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) are not applicable to these units from the 2003 modification.

In order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable for (c)

the 2015 modification, the Permittee shall comply with the following:

Deliberative Process

